

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JOSE JESUS PEDRAZA PULIDO

Plaintiff,

v.

RENE REYNOSO, JR.

Defendants.

)
)
)
)
)
)
)
)
)
)
)

Case No. 1:23-cv-01296-TWP-MJD

DEFENDANT'S MOTIONS IN LIMINE

Defendant the Rene Reynoso, Jr. ("Defendant"), by counsel, prior to the selection of the jury, requests that this Court order and admonish the parties, and any witnesses called by any of the parties not to mention, refer to, interrogate concerning, or in any way attempt to convey to the jury panel or the jury in any manner, directly or indirectly, the following matters:

1. Any and all references to social unrest and protests against law enforcement related to this incident or any alleged constitutional violations or racial profiling by law enforcement involving Indianapolis Metropolitan Police Department ("IMPD") or any other law enforcement agency.
2. Any reference or evidence concerning news and media reports, stories and accounts of this incident or any alleged constitutional violations or racial profiling by law enforcement involving IMPD or any other law enforcement agency.

3. Any reference or evidence concerning other lawsuits filed against Defendant, IMPD, the City of Indianapolis or any other individual law enforcement officer.
4. Any reference or evidence of settlement negotiations.
5. Any and all changes or revisions to IMPD policy that occurred after the incident at issue.
6. Any and all references, evidence, or testimony relating to the towing of Plaintiff's vehicle after the traffic stop at issue and the related vehicle inventory conducted as a part of towing the vehicle or damages related to those actions.
7. Any and all testimony by lay witnesses that Defendant's decision to tow Plaintiff's vehicle was improper, unnecessary, excessive, or unlawful.
8. Any reference to the absence of a tow inventory receipt or report.
9. Any and all references, evidence, or testimony relating to Plaintiff's arrest after the traffic stop at issue, subsequent incarceration or prosecution or damages related to those actions.
10. Any and all testimony by lay witnesses that Defendant's decision to arrest Plaintiff was improper, unnecessary, excessive, or unlawful.
11. Any and all reference, evidence, or testimony relating to any expert reports, records, opinions of any experts not previously disclosed.
12. Any substantive evidence not previously disclosed or discovered.
13. Any reference, evidence, or testimony discussing the lack of IMPD dash camera video footage of the alleged traffic violations or subsequent traffic stop.

14. Any and all references, evidence, or testimony relating to any other alleged incidents of constitutional violations by Defendant or any of the other involved IMPD officers.

Wherefore, Defendant Rene Reynoso, Jr., by counsel, prays that his Motions in *Limine* be granted and that the Court order and admonish that the parties, counsel for the parties, and any witnesses called by any parties not mention, refer to, interrogate concerning, or in any way attempt to convey to the jury panel or the jury in any manner, direct or indirectly, the matters that Defendant has moved to exclude in this motion, and for all other just and proper relief.

Respectfully submitted,

OFFICE OF CORPORATION COUNSEL
/s/ Kiely C. Keesler
Kiely C. Keesler (35980-49)
Chief Litigation Counsel
200 E. Washington Street, Suite 1601
Indianapolis, IN 46204
T: (317) 327-4055
F: (317) 327-3968
Kiely.Keesler@indy.gov

CERTIFICATE OF SERVICE

I hereby certify that on this Wednesday, May 14, 2025 a copy of the foregoing was filed electronically. Service of this filing will be made on all ECF-registered counsel by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Kiely C. Keesler

Kiely C. Keesler (35980-49)
Chief Litigation Counsel